

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Judge Thomas J. Tucker
	)	
_____	)	

**STIPULATION FOR THE ENTRY OF AN ORDER MODIFYING THIS  
COURT’S JUNE 27, 2016 ORDER (DOCKET NUMBER 11326)**

The City of Detroit, Michigan (“City”), AFSCME Council 25 and Its  
Affiliated Detroit Locals (“AFSCME”) and the Coalition of Detroit Unions  
 (“Coalition”) stipulate and agree as follows:

A. On February 21, 2014, AFSCME filed proof of claim 2958  
 (“AFSCME Claim”) which was comprised of 20 components. On that same date,  
the Coalition filed proof of claim 2851 (“Coalition Claim”).

B. On May 29, 2015, this Court entered its Order Regarding Further  
Proceedings on the City of Detroit’s Objections to Proof of Claim Number 2581  
Filed by the Coalition of Detroit Unions and to the Proof of Claim Number 2958  
Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals (Doc.  
No. 9900).

C. On July 19, 2015, this Court entered the Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10071).

D. On September 30, 2015, this Court entered the Order Modifying Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals (Doc. No. 10219).

E. On November 25, 2015, this Court entered the Order Modifying This Court's September 30, 2015 Order (Doc. No. 10286).

F. On January 29, 2016, this Court entered the Order Modifying This Court's November 25, 2015 Order (Doc. No. 10740).

G. On April 29, 2016, this Court entered the Order Modifying This Court's January 29, 2016 Order (Doc. No. 11133).

H. On June 27, 2016, his Court entered the Order Modifying This Court's April 29, 2016 Order (Doc. No. 11326) ("Order").

After the entry of the Order, the parties continued their productive discussions regarding the resolution of the Coalition Claim and the AFSCME

Claim and the parties have agreed to the terms of a complete settlement of the AFSCME Claim and the Coalition Claim. The City has obtained approval of the settlement by the City Council. The parties are currently working to finalize a motion and proposed Order for approval of the compromise, which the parties anticipate will be filed within the next three to four weeks. The parties request that the Court provide them with an additional sixty days to finalize and file the motion and for a hearing to be held on the motion.

NOW, THEREFORE, the City, AFSCME and the Coalition stipulate and agree as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from August 29, 2016 to October 28, 2016.
2. The filing deadlines in paragraph 1.B of the Order are extended from October 28, 2016 to December 27, 2016.
3. The filing deadlines in paragraph 1.C of the Order are extended from November 28, 2016 to January 27, 2017.
4. The filing deadlines in paragraph 1.D of the Order are extended from September 9, 2016 to November 8, 2016.

SO STIPULATED:

/s/ Richard G. Mack  
Richard G. Mack, Jr.  
Adam Graham  
MILLER COHEN PLC  
600 West Lafayette Boulevard  
4th Floor  
Detroit, MI 48226  
Telephone: (313) 566-4787  
Facsimile: (313) 964-4490  
richardmack@millercohen.com

ATTORNEYS FOR AFSCME AND  
THE COALITION

/s/ Marc N. Swanson  
John H. Willems (P31861)  
Jonathan S. Green (P33140)  
Marc N. Swanson (P71149)  
MILLER, CANFIELD, PADDOCK  
AND STONE, P.L.C.  
150 West Jefferson  
Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
willems@millercanfield.com

ATTORNEYS FOR THE CITY

DATED: August 26, 2016

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Judge Thomas J. Tucker
	)	
_____	)	

**ORDER MODIFYING THIS COURT’S JUNE 27, 2016 ORDER  
(DOCKET NUMBER 11326)**

This case is before the Court on the stipulation filed on August 26, 2016 entitled “Stipulation for the Entry of an Order Modifying this Court’s June 27, 2016 Order (Docket Number 11326)” (Docket # \_\_\_\_\_, the “Stipulation”).

Based on the Stipulation,

IT IS ORDERED THAT the Court’s June 27, 2016 Order entitled “Order Modifying This Court’s April 29, 2016 Order (Doc. No. 11326)” (the “Order”) is modified as follows:

1. The filing deadlines in paragraph 1.A of the Order are extended from August 29, 2016 to October 28, 2016.
2. The filing deadlines in paragraph 1.B of the Order are extended from October 28, 2016 to December 27, 2016.

3. The filing deadlines in paragraph 1.C of the Order are extended from November 28, 2016 to January 27, 2017.

4. The filing deadlines in paragraph 1.D of the Order are extended from September 9, 2016 to November 8, 2016.